

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA)
)
v.) Case No. 4:04-cr-70083
)
ANTHONY PLUNKETT)

MOTION TO WITHDRAW

The undersigned counsel respectfully submits this motion for leave to withdraw as counsel for Anthoine Plunkett. After conferring with Mr. Plunkett, there exists a fundamental and irreconcilable disagreement about what claims should be properly before this court such that continued representation is untenable. As such, Mr. Plunkett has unequivocally requested counsel withdraw as he wishes to proceed pro se.

As Mr. Plunkett requests to proceed pro se, undersigned counsel solicits this Court to give him additional time in which to file his reply to the government's response to his § 2255 petition. Because of covid lockdowns and protocols, Mr. Plunkett has had limited access to the law library. Counsel is today mailing Mr. Plunkett the opinions in *Apprendi* and *Davis* to assist him in bringing his reply, and thus respectfully requests that Mr. Plunkett have adequate time to craft that reply as supported by caselaw.

Respectfully submitted,

/s Arin Melissa Brenner

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the counsel of record.

/s Arin Melissa Brenner

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